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17 **UNITED STATES DISTRICT COURT**

18 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

19 JANET GARCIA, GLADYS
20 ZEPEDA, MIRIAM ZAMORA, ALI
21 EL-BEY, PETER DIOCSON JR,
22 MARQUIS ASHLEY, JAMES
HAUGABROOK, individuals,
KTOWN FOR ALL, an
unincorporated association;
ASSOCIATION FOR
RESPONSIBLE AND EQUITABLE
PUBLIC SPENDING, an
unincorporated association,

Plaintiffs,

v.

CITY OF LOS ANGELES, a
municipal entity; DOES 1-7,

Defendants.

) CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF CATHERINE
SWEETSER**

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27 Peter Diocson Jr., Marquis Ashley, Ali El-Bey, and
28 Association for Responsible and Equitable Public
Spending.*

DECLARATION OF CATHERINE SWEETSER

1. My name is Catherine Sweetser. I am one of the attorneys for Plaintiffs in this action. I have personal knowledge of the facts contained in this declaration, and if called to testify, I could and would testify competently as to the truth of the facts in this declaration.

2. On June 30, 2020, I heard that there were signs posted on Rose Avenue in Venice that said that bulky items would be taken. In the evening on June 30, I drove to Rose Avenue to take a look at the signs and how they were placed around the people camping there.

3. There are people camping on an unpaved section of sidewalk next to the Penmar golf course on Rose between Frederick and Penmar. On the evening of June 30, I found a sign posted on a pole next to a few tents. True and correct copies of my pictures of that sign as it appeared on June 30, 2020 are attached as **Exhibit A**.

4. I asked some people at the encampment whether they had heard anything about a July 1, 2020 clean up taking place on Rose. I was told by one unhoused person that a Los Angeles Sanitation worker had told them that bulky items would be taken on July 1, 2020. This person told me that he was moving his bicycle inside his tent so that it would not be taken during the clean up. Another person told me that a City employee had told them the same, although they did not know whether it was a Sanitation employee who had given them that information.

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5. Plaintiffs' attorneys emailed the City Attorney to say that people at the encampment had stated that they had heard about the bulky item clean up from City employees, together with a picture of the signs, on the evening of June 30, 2020. In that email, we requested that the City Attorney investigate and tell us whether the City intended to take bulky items at that encampment on July 1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2020, in Los Angeles, California

CATHERINE SWEETSER

EXHIBIT A





